

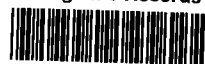
**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

Date: Tuesday, November 13, 2007

From: Kevin Turner, OSC

Subject: Clayton Chemical/RRG Soils Removal
#1 Mobile Avenue, Sauget, IL
Latitude: 38.8303
Longitude: -90.1825

EPA Region 5 Records Ctr.



284284

POLREP No.:	3	Site #:	
Reporting Period:		D.O. #:	
Start Date:		Response Authority:	CERCLA
Mob Date:	12/5/2005	Response Type:	Time-Critical
Completion Date:		NPL Status:	Non NPL
CERCLIS ID #:		Incident Category:	Removal Action
RCRIS ID #:		Contract #	

Site Description

Please refer to POLREP #1

Current Activities

- CRA and Brandenburg re-mobilized on February 2, 2007 to remove and dispose of treated stockpiles 4 and 4B. A total of 12 tandem trailer truck loads were hauled off-site to the TSDF facility located in Belleville, Michigan. In addition, thirty-seven (five over-packed) 55-gallon drums non-hazardous waste located on tank pad and warehouse was removed off-site for RCRA incineration at the Veolia Environmental, Inc. TSDF located in Sauget, IL.
- On February 6, 2007 Grossman Iron and Steel picked up one 20 cubic yard dumpster filled with scrap metal for salvaging. Approximately 3,920 feet of piping and metal scrap were removed off-site.
- On February 6, 2007 the detached dock (EZ4) cleanup commenced with the excavation of contaminated soils, debris, and sludge. Eight 20 cubic yard roll-off dumpsters were hauled off-site to the TSDF facility located at Port Author, Texas. The final size of the excavation measured approximately 16 feet wide by thirty-four feet long and an average depth of four feet.
- On February 7, 2007 CRA and Brandenburg began and completed backfilling within the proposed cap area and detached dock area. Clean gravel was obtained from Columbia quarry and consisted of ¾-inch minus and three-inch clean rock.

- On March 30, 2007 CRA removed an additional five 55-gallon drums of sodium hydroxide, and two 55-gallon drums containing PPE from the warehouse on-site. In addition, two 55-gallon drums containing waste oil (from tank A-1 and 117), and six 55-gallon drums containing wastes from Tank 43 were also hauled off-site to the RCRA incineration facility of Veolia Environmental Services located in Sauget, IL.

- On March, 21 2007, CRA and START reported findings of two open holes in a below grade concrete structure from a former railroad roundhouse structure located on the northeast corner of the site. The first open hole is located approximately 165 feet from the main entrance to the northeast along Mobile Drive and is approximately twelve-inches long by four-inches wide; rebar is visible and the depth to the petroleum oily material is six-inches below ground. The second hole is smaller in size (four-inches by three-inches) and is approximately 35 feet to the southeast of the larger hole; investigation of this hole revealed a lateral extension of 18-inches below ground and was also six-inches in depth to the petroleum material. CRA collected a sample of the oily material. The analytical report of the petroleum material showed concentrations of PCBs above 50 parts per million and demonstrates a characteristic of flammability/ignitibility.

- CRA performed weekly site visits of the oil pits from late March to early June, 2007 with little to no change in the size of both oil pits. Additional oil staining was noted around the base of former concrete tank pad. The area of surface staining encompasses an area approximately 32 feet by 35 feet in size.

- CRA conducted the oil pit investigation on June 4 through 5, 2007 on-site. Utilization of a track-hoe uncovered a trench approximately 12- feet long by 5 feet wide. The pit contained PCB contaminated petroleum material, debris and water. A vacuum truck (Triad Transport, Inc.) removed approximately 1,500-gallons of the petroleum material and water for ultimate disposal at the TSDF facility located at Deer Park, Texas. CRA collected additional samples for purpose of waste profiling for Clean Harbors.

- CRA conducted the warehouse dock investigation on June 6, 2007. CRA advanced a total of eight 12-inch diameter borings using a diamond tipped rotary drill platform. The drill platform cut through each concrete boring (approximately 6-inches thick). Once the boring was removed, hand augers were advanced at two locations to a depth of approximately 40-inches. The borings revealed no apparent soil contamination, and as such, no further investigation was warranted at this time.

- On June 6, 2007 Waste Management Inc. removed one 40 cubic yard open-top dumpster containing rubbish and wood pallets from the site.

- CRA and Brandenburg demobilized on June 7, 2007 from the site. CRA is awaiting the decision of the PRPs for the next planned activities.

Planned Removal Actions

- The submittal of a work plan and subsequent additional investigation and characterization of the oil pit (former roundhouse) by CRA.
- USEPA approved the draft cap design proposal, conducts the oversight and approval of the construction and implementation of the cap design. The work associated to installation of the cap is pending at this time.

Next Steps

- Oversight, and/or review of the CRA cap design proposal.
- Oversight and documentation of remediation and cleanup activities for the existing oil pit trenches (located in the former area of the roundhouse as shown on the 1959 aerial photograph).

Key Issues

- Development and submittal of a work plan by CRA for the oil pit trenches remediation/cleanup activities to the USEPA OSC and START for review.
- CRA has submitted a revised plan for a cap design to the USEPA OSC, pending approval at this time.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$60,000.00	\$18,996.00	\$41,004.00	68.34%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$0.00	\$16,378.00	(\$16,378.00)	0.00%
Total Site Costs	\$60,000.00	\$35,374.00	\$24,626.00	41.04%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.